

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

CONOPCO, INC. d/b/a/ UNILEVER,

Plaintiff,

v.

2026 THIRD REALTY, LLC, HAE HEE
KIM, COURTNEY HAEJIN KIM, DANIEL
KIM, BRYANT KIM, K & K FOOTWEAR,
INC., AND JOHN DOES 1-10, inclusive,

Defendants.

Case No. 22-cv-3480-AT

**SUPPLEMENTAL DECLARATION OF STEPHEN
G. WARD IN SUPPORT OF CONOPCO, INC.
D/B/A UNILEVER'S EMERGENCY MOTION FOR
MODIFICATION OF *EX PARTE* TEMPORARY
RESTRAINING ORDER; ASSET RESTRAINING
ORDER AUTHORIZING; *EX PARTE* SEIZURE;
ORDER TO SHOW CAUSE FOR PRELIMINARY
INJUNCTION; AND ORDER ALLOWING
EXPEDITED DISCOVERY**

FILED UNDER SEAL

I, STEPHEN G. WARD, declare as follows:

1. I am a private investigator licensed in New York, and the CEO of Polaris Corporate Risk Management, LLC. I am over the age of 18 and am competent to make this declaration which is based upon my personal knowledge of the facts stated herein. If called as a witness, I could and would testify to the statements made herein. I make this declaration in support of Plaintiff Conopco, Inc. d/b/a Unilever's ("Unilever")'s emergency motion for modification of the *Ex Parte* Temporary Restraining Order; Asset Restraining Order; Order Authorizing *Ex Parte* Seizure; Order to Show Cause for Preliminary Injunction; and Order Allowing Expedited Discovery ("Amended TRO").

2. On April 27, 2022, I submitted a declaration in support of Unilever's Application for an *Ex Parte* Temporary Restraining Order; Order Authorizing *Ex Parte* Seizure; Order to Show Cause for Preliminary Injunction; and Order Allowing Expedited Discovery ("Original TRO Application").

3. On April 29, 2022, the Court granted the Original TRO Application and issued an *Ex Parte* Temporary Restraining Order; Order Authorizing *Ex Parte* Seizure; Order to Show Cause for Preliminary Injunction; and Order Allowing Expedited Discovery (“Original TRO”).

4. On May 3, 2022, with the assistance of the New York Police Department (“NYPD”), I executed the seizure order included in the Original TRO at two locations: (1) 2026 3rd Avenue, New York, 10029 (the “First Location”), and (2) 1992 3rd Avenue, New York, NY 10029 (“Second Location”).

5. While in the process of executing the seizure order included in the Original TRO at the First Location, an unidentified Black male (“Individual 1”) approached me and asked me what we were looking for. I advised Individual 1 that we were gaining entry to search the First Location to search for pallets of Hellmann’s-branded mayonnaise. Individual 1 advised that he knew about the mayonnaise because it was his company that bought the mayonnaise.

6. Individual 1 subsequently led me inside the AMIS DISCOUNTED FURNITURE LLC (“AMIS Furniture”) storefront located at 2020 Third Avenue, New York, New York 10035 (“AMIS Location 1”). Upon entering AMIS Location 1, Individual 1 logged into a computer and showed me screens of a Unilever website and claimed that he had purchased the goods from Unilever. With the permission of Individual 1, I took photographs of the said screens. Individual 1 advised that the mayonnaise was shipped to Gambia, Africa, approximately two weeks ago.

7. Individual 1 provided the name Seedy Sannah, who is allegedly the individual taking custody of the shipped Hellmann’s mayonnaise from Individual 1. I was also advised by Individual 1 that he shipped 17,280 units of Hellmann’s mayonnaise, equivalent to roughly 24 pallets.

8. Also outside of the First Location, an unidentified Hispanic male (“Individual 2”) approached me and advised that the mayonnaise in question was expired and that for several weeks, the owners of AMIS Furniture had a crew of three people working around the clock to affix fake labels on the expired mayonnaise. Individual 2 stated that the mayonnaise was removed from the Location yesterday (May 2, 2022).

9. I gained entry to the First Location and found, among other things, garbage bags filled with removed Hellmann’s mayonnaise labels.

10. Inside the First Location, we also found several boxes that appear to be from Vibrant Printing and Graphic located at 4015 White Plains Road, Bronx, New York 10466 (“Vibrant Printing”). Vibrant Printing appears to have printed the counterfeit Hellmann’s labels..

11. I was advised by the First Location’s superintendent that AMIS Furniture has been using the storefront at the First Location as a storage unit, but he was not aware if the owners of the building located at the First Location were involved with AMIS Furniture.

12. While searching the First Location, we discovered bank statements and checks from the following institutions:

- Bank of America (AMIS Discounted Furniture LLC, Account No. 00135 021000322 4830780055948)
- Citibank (AMIS Discounted Furniture LLC, Account No. 021000089 6863941479 1004)
- TD Bank (AMIS Discounted Furniture LLC, Account No. 434-0186819; Customer Reference No, 4340186819-713-T-####)
- Chase (Card #_5917; AID# A0000000980840)

13. Other documents located at the First Location showed that AMIS Furniture has an address at 2022 3rd Avenue, New York, New York 10029.

I declare under penalty of perjury under the laws of the United States of America the foregoing is true and correct.

Executed on May 3, 2022 in New York, New York.

/s/ Stephen G. Ward
Stephen G. Ward

